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October 8, 2014

BY ECF AND FAX:

Honorable Naomi Reice Buchwald
United States District Judge
500 Pearl Street
New York, NY 10007-1312

Re: *In re LIBOR-Based Financial Instruments Antitrust Litigation*
11-MD-2262 (NRB)

Dear Judge Buchwald:

Pursuant to Rule 2.B of Your Honor's Individual Practices, Exchange-Based Plaintiffs ("Plaintiffs") are writing in order to request a pre-motion conference for permission to file the following: Motion To Preliminarily Approve Exchange-Based Plaintiffs' Settlement With Defendant Barclays Bank PLC And To Conditionally Certify Settlement Class

On October 7, 2014, Plaintiffs and Barclays Bank PLC ("Barclays") entered into a Settlement Agreement. Pursuant thereto, Barclays has agreed to pay \$19,975,000.00, provide cooperation to Plaintiffs, and provide the other consideration described in the proposed motion in return for the dismissal and release described therein.

Barclays consents to this proposed motion. This Court's power to hear such a settlement in this multidistrict litigation, and the merits of doing so, are fully addressed in the motion papers. In this regard, the parties also respectfully request leave to submit a brief that is 36 pages in length.

In further support of this motion, Plaintiffs have attached their proposed memorandum of law and proposed declaration in support of the proposed motion. Plaintiffs will not file a notice of motion or file the motion papers unless and until the Court grants the relief requested herein.

Thank you very much.

Respectfully submitted,

/s/ Christopher Lovell
LOVELL STEWART HALEBIAN
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/s/ David Kovel
KIRBY McINERNEY LLP

cc: All Counsel (by electronic service)